



## California Sportfishing Protection Alliance

*"An Advocate for Fisheries, Habitat and Water Quality"*

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15 July 2009

Mr. Ken Landau, Assistant Executive Officer  
Ms. Diana Messina, Supervising WRCE  
Mr. Jim Marshall, Sr. WRCE  
Regional Water Quality Control Board  
Central Valley Region  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6144

VIA: Electronic Submission  
Hardcopy if Requested

RE: Tentative Order Amending Waste Discharge Requirements Order No. R5-2008-0185  
(NPDES No. CA0077933) for City of Williams Wastewater Treatment Plant, Colusa  
County

Dear Messrs. Landau, Marshall and Ms. Messina;

The California Sportfishing Protection Alliance (CSPA) has reviewed the proposed amendment of Waste Discharge Requirements (NPDES No. CA0077933) for City of Williams Wastewater Treatment Plant (Permit, Amendment) and submits the following comments.

CSPA requests status as a designated party for this proceeding. CSPA is a 501(c)(3) public benefit conservation and research organization established in 1983 for the purpose of conserving, restoring, and enhancing the state's water quality and fishery resources and their aquatic ecosystems and associated riparian habitats. CSPA has actively promoted the protection of water quality and fisheries throughout California before state and federal agencies, the State Legislature and Congress and regularly participates in administrative and judicial proceedings on behalf of its members to protect, enhance, and restore California's degraded water quality and fisheries. CSPA members reside, boat, fish and recreate in and along waterways throughout the Central Valley, including Colusa County.

The proposed Amendment removes a requirement to provide continuous chlorine monitoring and requires grab samples be collected for chlorine until the disinfection system is replaced with an ultra-violet light disinfection system. Our comments are as follows:

- The City of Williams has a long history of using chlorine at the wastewater treatment plant headworks for odor control. Chlorine is frequently utilized at tertiary plants for filter backwash. Chlorine is also routinely used for washdown and collection system odor control. Before eliminating the requirements to conduct sampling for chlorine; the Regional Board should require discontinuation of all chlorine uses throughout the

treatment and collection system.

- The California Water Code § 13176 (CWC) requires that:
  - (a) The analysis of any material required by this division shall be performed by a laboratory that has accreditation or certification pursuant to Article 3 (commencing with Section 100825) of Chapter 4 of Part 1 of Division 101 of the Health and Safety Code.
  - (b) No person or public entity of the state shall contract with a laboratory for environmental analyses for which the State Department of Health Services requires accreditation or certification pursuant to this chapter, unless the laboratory holds a valid certification or accreditation.

The holding time for chlorine is extremely short which will prohibit transport to a commercial laboratory. In order to conduct the proposed chlorine sampling and analysis; Williams' will need to be ELAP certified for chlorine in accordance with the CWC. Failure to obtain ELAP certification would violate the CWC and leave the City vulnerable to third party lawsuits.

Thank you for considering these comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Jennings", with a stylized, cursive script.

Bill Jennings, Executive Director  
California Sportfishing Protection Alliance